

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	Case No. 3:18-CR-345-L
	§	
ANDREW BLAIR KASNETZ	§	

**DEFENDANT’S MOTION FOR LEAVE TO FILE RESPONSE
TO GOVERNMENT’S OBJECTIONS TO DEFENDANT’S EXHIBIT LIST**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE SAM LINDSEY:

COMES NOW, Defendant, Andrew Kasnetz, through the undersigned counsel, making and filing this his *Motion for Leave to File Response to Government’s Objections to Defendant’s Exhibit List* and, in support thereof, would respectfully show unto the Court the following:

1. For good cause, Defendant moves the Court for leave to file Defendant’s response to the Government’s objections to the Defendant’s Exhibit List for the reason that Defendant has been to great degree unable to participate in the defense of this case for the last several weeks due to having had several recent necessary surgeries (an ablation performed on February 15, 2022, rotator cuff repair on March 8, 2022, and hyperplasia on March 25, 2022) and associated post-operative pain, medication and recuperation.

2. Accordingly, Defendant moves the Court for leave to file its response to the Government’s objections to the Defendant’s exhibit list after the Court’s deadline.

3. Defendant, by and through his undersigned counsel, would offer the following by way of response to the Government’s objections:

No.	Description	Reason
3	Taly Haffar email	The email is relevant to Defendant's defense. R. 401.
4	Video of custodial questioning of defendant	The video is relevant and is not hearsay. R. 401 & 801.

WHEREFORE, PREMISES CONSIDERED, Defendant moves the Court for leave to file the Defendant's response to the Government's objections to the Defendant's exhibit list.

Respectfully submitted:

By: /s/ Jeffrey T. Hall
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**ATTORNEY FOR DEFENDANT
ANDREW BLAIR KASNETZ**

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a copy of the foregoing document was served by filing electronically, utilizing the CM/ECF system currently in operation by this Court, which CM/ECF system will automatically notify the assigned prosecutor at the United States Attorney's Office for the Northern District of Texas. The electronic case filing system will send a Notice of Electronic Filing to opposing counsel of record. Accordingly, this document was served, under the Federal Rules of Criminal Procedure, upon all parties or their counsel of record on April 7, 2022.

/s/ Jeffrey T. Hall
Jeffrey T. Hall